

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

JUL 28 1995

Mr. Thomas Ames
BRAC Environmental Coordinator
Naval Air Warfare Center
Aircraft Division
Warminster, Pennsylvania 18974

Mr. Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
10 Industrial Highway
Lster, Pennsylvania 19113

Re: Naval Air Warfare Center (NAWC)

Dear Mr. Ames and Mr. Monaco:

This letter provides a response to a letter from Mr. Monaco to our office dated June 27, 1995, regarding CERCLA Remedial Investigation work addressing Area D at NAWC. This response was discussed in part during a meeting of the Technical Subcommittee of the Restoration Advisory Board on July 19, 1995. The subject letter indicates that the Navy "does not propose to perform any soil gas work in Area D" because "there is no evidence of a potential source of contamination to groundwater within Area D, other than within/beneath the main building complex."

You will recall that EPA has previously requested Area D include the "main building complex" (defined as Buildings 1, 2 and 3) and all other NAWC property west of Jacksonville Road which is not part of Area A (see EPA letters dated August 24, 1994, and October 18, 1994). In this case, the comments below regarding potential soil gas work within Area D address (1) portions of Area D outside of Buildings 1, 2, and 3, and (2) portions of Area D occupied by the Buildings 1, 2 and 3.

PORTIONS OF AREA D OUTSIDE OF BUILDINGS 1, 2, AND 3

Your letter indicates "the only feature of concern" in this area was a "potential pit identified by EPIC" which was subsequently determined to be "an excavation for the installation of underground fuel storage tanks, not a waste disposal activity". EPA agrees the "potential pit identified by EPIC" (see pages 37 and 38 of EPIC Report #TS-PIC-93053) is apparently associated with the installation of underground storage tanks being addressed under the Environmental Baseline Survey process. On the other hand, there are other features of potential concern in this area.

Four such features identified by EPIC Report #TSPIC-95009 and not investigated by the Navy to date are listed below (with the relevant page number of the report):

- (1) Drainage channel starting near west side of large building and ending near building's north corner (pg. 5)
- (2) Mounded material approximately 250 feet north of large building's north corner (pg. 13)
- (3) Triangular area of bare ground (pg. 17)
- (4) Drainage channel starting near north corner of large building and ending at road leading to WWTP (pg. 7)

As in other cases of potential subsurface disposal identified by EPIC and otherwise, soil gas surveys should be considered at features (1), (2) and (4).

An Aerial Photograph Interpretation Report for NAWC (HNUS, 1993) has also identified a large disturbed section of this area alleged to be "a probable dump area for cut-up fuel tanks and incinerated rubber linings." This area has been identified as "Site 9" in the Phase III RI Workplan of January 1995. Given the allegations, a soil gas survey should be considered at "Site 9".

Finally, other potential sources of contamination in this area include industrial wastewater sewers or other subsurface lines or drains which may have been used to convey liquid waste containing CERCLA hazardous substances (such VOCs) or petroleum products from Buildings 1, 2 and 3 (or other locations) to the wastewater treatment plant (or other locations). A review of background information should be conducted to determine the location, nature and potential past use of these lines and drains. As in the case of other areas where soils may be contaminated with VOCs, soil gas survey work should be performed as necessary to target the location of soil samples to investigate these sewer or drain lines.

The letter states that "based on the groundwater sampling results and EBS study findings, the groundwater impacts appear to be emanating from beneath the building complex". While EPA agrees the area covered by Buildings 1, 2 and 3, is a likely source of the groundwater contamination, as suggested by the comments above, this does not appear to be the only potential source. However, if the Navy has concluded that, based on groundwater sampling results and EBS study findings, the "building complex" is the only source, please cite the specific data of concern and explain how they support this conclusion.

AREA OCCUPIED BY BUILDINGS 1, 2 AND 3

Since the subject letter does not make any proposal regarding soil gas work within this area, the Navy's plans in this regard are unclear. However, as in the case of other areas which may contain VOC-contaminated soils, a soil gas survey should be performed as necessary to target the location of soil samples. Any soil gas survey should be scoped upon review of pertinent background information. You will recall EPA comments dating back to May 11, 1994, requesting the Navy review historic information regarding "drain lines" within Buildings 1, 2 and 3 as part of the RI scoping process. As discussed, given the closure of NAWC is targeted for March 1997 and the onsite laboratory for soil gas analysis may be demobilized in the near future, the review of this background information and subsequent scoping of any soil gas survey cannot be delayed any further. Portions of Buildings 1, 2, and 3 formerly used for aircraft maintenance and/or manufacturing are of particular concern.

AREA OF BUILDING 4

In a related matter, as you are aware, aircraft maintenance and/or manufacturing activities have been conducted within and in the area of the aircraft hanger (Building 4) on the west side of Jacksonville Road for a period of approximately 50 years. Due to the potential for release of CERCLA hazardous substances (e.g., VOCs) and petroleum products, the Navy should initiate field investigations in this area. As with Buildings 1, 2, and 3, a review of information regarding the location of sewer lines and drain lines should be conducted to help scope any soil gas survey work. Again, due to the pending closure of NAWC and the planned demobilization of the on-site soil gas analysis laboratory, the review of background information and any subsequent soil gas survey should be performed as soon as possible. As a member of the BRAC Cleanup Team, we suggest the Navy perform this work as part of the ongoing CERCLA Remedial Investigation.

We look forward to discussing any questions or comments or questions you may have regarding the above.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: David Kennedy, PADEP
Kathy Davies
Ben Mykijewycz
Andy Rola, B & V